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### REMARKS

The issues currently in the instant application are as follows:

- The drawings were objected to.
- The specification was objected to.
- Claims 8 and 16 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention.
- Claims 1-2, 4-11, and 15 were rejected under 35 U.S.C. § 102(b) as being anticipated by US 6,934,564 (Laukkanen).
- Claims 3 and 13 were rejected under 35 U.S.C. 103(a) as being unpatentable over US 6,934,564 (Laukkanen).
- Claims 12 and 14 have been objected to as being dependent upon a rejected base claim.

Applicant traverses all the outstanding objections and rejections and requests reconsideration and withdrawal thereof in light of the amendments and remarks contained herein.

#### Drawings

The drawings are objected to as failing to comply with 37 C.F.R. § 1.84(p)(5) because they do not include a reference number "200C" mentioned in paragraph [0036]. Paragraph [0036] clearly describes 200C as a Unicode code, not a reference number. Thus, there is no reference number "200C" and there is no need to correct any drawings. Withdrawal of the objection to the drawings is respectfully requested.

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### Specification

Examiner's objection to the omission of a "Summary of the Invention" is hereby traversed. 37 CFR § 1.73 entitled "Summary of the invention" states:

"A brief summary of the invention indicating its nature and substance, which may include a statement of the object of the invention, *should* precede the detailed description. Such summary should, when set forth, be commensurate with the invention as claimed and any object recited should be that of the invention as claimed." (emphasis added)

In contrast to the use of the word "should" in § 1.73, other related sections such as § 1.71 (Detailed description and specification of the invention) and § 1.72(b) (Title and abstract) use the word "must". Construing the intent of these sections, the "Brief Summary of the Invention" is considered to be desirable but yet not required as the other portions of the application.

Applicant has corrected the typographical error in paragraph [0042] at the end of line 6 on page 12 of the originally-filed specification.

Withdrawal of the objections to the specification is respectfully requested.

### Amendments to the Claims

Claim 16 has been amended to correct a typographical error. The conversion of a Half-Character intermediate code into a Half-Character character code sequence if the first character code represents a consonant is clearly described in FIG. 3 elements 390 and 395 and paragraph [0040]. No new matter has been entered.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment was made for the purpose of narrowing

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the scope of any claim, unless Applicant had argued herein that such amendment was made to distinguish over a particular reference or combination of references.

Information Disclosure Statement

Applicant filed an Information Disclosure Statement on March 31, 2004 along with a Form PTO/SB/08 and a copy of the cited reference. Applicant did not receive an initialed copy of the Form PTO/SB/08 with the November 1, 2005 Office Action, and Applicant hereby requests an initialed copy of the Form PTO/SB/08 filed March 31, 2004. If the Examiner did not receive the March 31, 2004 Form PTO/SB/08 and a copy of the cited reference, the Examiner is invited to contact Applicant's representative at the telephone number listed below to obtain duplicate copies.

35 U.S.C. § 112(2)

Claims 8 and 16 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Regarding claim 8, the Examiner is correct in interpreting that "any following character" does fulfill the condition; however, *no* following character does not fulfill the condition. Thus, there is a significant conditional basis in claim 8, and Applicant requests reconsideration and withdrawal of the rejection of claim 8 under 35 U.S.C. § 112(2).

Regarding claim 16, claim 16 has been amended to correct a typographical error. Applicant requests reconsideration and withdrawal of the rejection of claim 16 under 35 U.S.C. § 112(2).

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35 U.S.C. § 102(a) - Laukkanen

Claims 1-2, 4-11, and 15 were rejected under 35 U.S.C. § 102(a) as being anticipated by US 6,934,564 (Laukkanen). Laukkanen proposes using a context shift key to switch between independent and dependent vowels of the Hindi/Devanagari script. Laukkanen is concerned with independent vowels and their related matras (dependent vowels) shown in FIG. 2 and FIG. 6 Key 1: vowels, Key 2: vowels, Key 1: matras, and Key 2: matras. Note that FIG. 5 of the pending application maps the independent and dependent vowels of the Hindi/Devanagari script to keys 8 and 9. In fact, FIG. 5 of the pending application more clearly shows how matras are related to their independent vowel counterparts.

The matras and their independent vowel counterparts do not involve intermediate codes. For example matra (Aa) is represented by character code 093E (as shown in FIG. 5 of the present application) or hexadecimal code DA-218 (as shown in Table 3 of the ISCII document submitted in an Information Disclosure Statement on March 31, 2004). The independent vowel form (Aa) is represented by character code 0906 or hexadecimal code A4-164. This is also consistent with column 8 lines 4-17 of Laukkanen.

In contrast to the selection of one character code over a different character code depending on rules regarding matras and independent vowels, the pending application is replacing an intermediate code with a character code sequence. First, this involves a completely different type of Devanagari character – a Halant. See FIG. 3 of Laukkanen and Section 6.3 (including subsections 6.3.1 and 6.3.2) of the ISCII document. Note how Halant is classified separately from Vowels and Matras (Section 6.1 of the ISCII document). Although Laukkanen describes the Halant character code in column 6 lines 34-52, Laukkanen never tries to discriminate among the various uses of the Halant character code: (1) omission of vowel sound, (2) creation of consonant clusters, and (3)

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creation of ligatures. Instead a context switch key \* is used only to create consonant clusters and a rendering engine is presumed to be able to create ligatures as soon as the user has entered an appropriate character sequence. See column 6 lines 34-37 of Laukkanen. Laukkanen does not show or suggest an intermediate code or converting an intermediate code into a character code. Column 2 lines 30-34 and column 3 lines 12-26 of Laukkanen merely underscore the fact that a Halant character code (094D) has multiple uses; Laukkanen does not show or suggest an intermediate code.

On the other hand, FIG. 6 of the pending application shows a first example of how a Ligature intermediate code, represented by "Lig:", is replaced by a character code sequence "094D 200D" in line 630 and subsequently replaced by character code sequence "094D" in line 640. FIG. 7 of the pending application shows a second example of how a Ligature intermediate code, represented by "Lig:", is replaced by a character code sequence "094D 200D" in line 740 and how an Explicit Virama intermediate code, represented by "EV:", is replaced by a character code 094D in line 750. FIG. 8 of the pending application shows a third example of how a Ligature intermediate code, represented by "Lig:", is replaced by a character code sequence "094D 200D" in line 830, how an Explicit Virama intermediate code, represented by "EV:", is replaced by a character code 094D in line 840, and how a Half-Character intermediate code, represented by "HC:", is replaced by a character code sequence "094D 200D" in line 850. *Note that the Halant character code 094D is included in the character code sequences that replace intermediate codes, but that the intermediate code is not a Halant character code.*

Because Laukkanen does not show or suggest "an intermediate code processor for changing intermediate codes into character code sequences and recording the character codes sequences in a display buffer" as recited in claim 1, claim 1 is not anticipated by Laukkanen. Claims 2 and 4-6 depend directly on indirectly upon claim 1 and also are not anticipated by Laukkanen.

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Because Laukkanen does not show or suggest "an intermediate code processor, coupled to the input buffer, for changing the intermediate code into one or more character codes depending on any preceding character code that precedes the intermediate code and for recording the one or more character codes in a display buffer" as recited in claim 7, claim 7 is not anticipated by Laukkanen. Claims 8-9 depend directly upon claim 7 and also are not anticipated by Laukkanen.

Because Laukkanen does not show or suggest "entering a first character code into a memory buffer; entering an intermediate code into the memory buffer; entering a second character code into the memory buffer; changing the intermediate code to one or more character codes" as recited in claim 10, claim 10 is not anticipated by Laukkanen. Claims 11 and 15 depend directly upon claim 10 and also are not anticipated by Laukkanen.

Reconsideration and withdrawal of the rejection of claims 1-2, 4-11, and 15 under 35 U.S.C. § 102(a) as being anticipated by Laukkanen is respectfully requested.

35 U.S.C. § 103(a)

Claims 3 and 13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over US 6,934,564 (Laukkanen). Regarding claims 3 and 13, an Explicit Virama intermediate code is not a subset of a conventional virama. A character code 094D can produce an explicit virama, but the character code 094D can also produce an uncomposed virama, a ligature, or a half-character. On the other hand, an Explicit Virama intermediate code can be changed to the character code 094D but only in situations which result in an explicit virama being rendered by a display engine. Because Laukkanen does not show or suggest an Explicit Virama intermediate code, claims 3 and 13 are not unpatentable in view of Laukkanen. Reconsideration and

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withdrawal of the rejection of claims 3 and 13 under 35 U.S.C. § 103(a) as being unpatentable in view of Laukkanen is respectfully requested.

Allowable Subject Matter

Applicant acknowledges the allowability of claims 12 and 14 if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicant gratefully acknowledges that the Examiner has indicated that claim 16 would be allowable if rewritten to overcome the rejections under 35 U.S.C. § 112(2) and to include all of the limitations of the base claims and any intervening claims.

SUMMARY

The application is in condition for allowance and a favorable response at an early date is earnestly solicited. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact Applicant's representative at the telephone number indicated below.

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Please charge any fees associated herewith, including extension of time fees, to  
**Deposit Account 502117.**

Respectfully submitted,

Please send correspondence to:  
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31 JAN 2006

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